

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

*In re: Shale Oil Antitrust Litigation*

This Document Relates to:

ALL ACTIONS

No. 1:24-md-03119-MLG-LF

**DECLARATION OF PATRICK J. COUGHLIN IN SUPPORT OF PLAINTIFFS'  
RESPONSE TO DEFENDANTS' JOINT MOTION TO DISMISS**

I, Patrick J. Coughlin, declare that the following is true and correct to the best of my knowledge and belief.

1. I am Of Counsel with Scott+Scott Attorneys at Law, Co-Lead Counsel for Plaintiffs in this matter.

2. I make this declaration in support of Plaintiffs' Response to Defendants' Joint Motion to Dismiss. I have personal knowledge of the matters stated herein and, if called upon, I could, and would, competently testify thereto.

3. Plaintiffs have provided notice of their suit to the Attorneys-General of Arizona, Colorado, Connecticut, Hawaii, Nevada, New York, Rhode Island, and Utah by causing to be delivered upon them Plaintiffs' Consolidated Class Action Complaint (Dkt. 86).

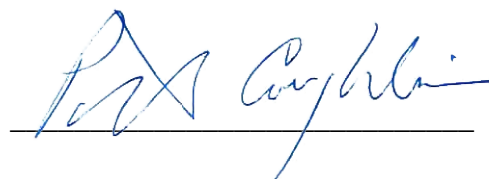
4. Below are true and correct copies of the following documents related to the provision of that notice:

<b>Exhibit No.</b>	<b>Description</b>	<b>Date</b>
<b>A</b>	A letter delivered to Arizona Attorney General Kris Mayes	March 14, 2025
<b>B</b>	A letter delivered to Colorado Attorney General Phil Weiser	March 14, 2025
<b>C</b>	A letter delivered to Connecticut Attorney General William Tong	March 14, 2025
<b>D</b>	A letter delivered to Hawaii Attorney General Anne E. Lopez	March 14, 2025
<b>E</b>	A letter delivered to Nevada Attorney General Aaron D. Ford	March 14, 2025
<b>F</b>	A letter delivered to New York Attorney General Letitia James	March 14, 2025

<b>Exhibit No.</b>	<b>Description</b>	<b>Date</b>
<b>G</b>	A letter delivered to Rhode Island Attorney General Peter F. Neronha	March 14, 2025
<b>H</b>	A letter delivered to Utah Attorney General Derek Brown	March 14, 2025
<b>I</b>	Certificate of Service (Dkt. 146)	March 14, 2025

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 10th day of April, 2025, in San Diego, California.

  
Patrick J. Coughlin

# **EXHIBIT A**



MOLLIE+CHADWICK

+ Via Certified U.S. Mail and E-Mail +

March 14, 2025

Office of the Attorney General of Arizona  
The Honorable Kris Mayes  
2005 N. Central Avenue  
Phoenix, AZ 85004-2926

Re: *IN RE: SHALE OIL ANTITRUST LITIGATION*  
Case No. 1:24-md-03119-MLG-LF (D.N.M.)

Dear Attorney General Mayes:

Pursuant to Arizona Revised Statute § 44-1415(A), Plaintiffs in the above-captioned case notify you of the above-filed case. Attached please find a copy of the Complaint in which the specific allegations are presented in detail.

Please do not hesitate to contact us if you have any questions.

Sincerely,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

A handwritten signature in blue ink, appearing to read "Mollie Chadwick".

Mollie Chadwick

## **EXHIBIT B**



MOLLIE+CHADWICK

+ Via Certified U.S. Mail and E-Mail +

March 14, 2025

Office of the Attorney General of Colorado  
The Honorable Phil Weiser  
Colorado Department of Law  
Ralph L. Carr Judicial Building  
1300 Broadway, 10th Floor  
Denver, CO 80203

Re: *IN RE: SHALE OIL ANTITRUST LITIGATION*  
Case No. 1:24-md-03119-MLG-LF (D.N.M.)

Dear Attorney General Weiser:

Pursuant to Colorado Revised Statute § 6-41-116, Plaintiffs in the above-captioned case notify you of the above-filed case. Attached please find a copy of the Complaint in which the specific allegations are presented in detail.

Please do not hesitate to contact us if you have any questions.

Sincerely,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

Mollie Chadwick

## **EXHIBIT C**





MOLLIE+CHADWICK

+ Via Certified U.S. Mail and E-Mail +

March 14, 2025

Office of the Attorney General of Colorado  
The Honorable Phil Weiser  
Colorado Department of Law  
Ralph L. Carr Judicial Building  
1300 Broadway, 10th Floor  
Denver, CO 80203

Re: *IN RE: SHALE OIL ANTITRUST LITIGATION*  
Case No. 1:24-md-03119-MLG-LF (D.N.M.)

Dear Attorney General Weiser:

Pursuant to Colorado Revised Statute § 6-41-116, Plaintiffs in the above-captioned case notify you of the above-filed case. Attached please find a copy of the Complaint in which the specific allegations are presented in detail.

Please do not hesitate to contact us if you have any questions.

Sincerely,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

Mollie Chadwick

## **EXHIBIT D**



MOLLIE+CHADWICK

+ Via Certified U.S. Mail and E-Mail +

March 14, 2025

Office of the Attorney General of Hawaii  
The Honorable Anne E. Lopez  
425 Queen Street  
Honolulu, HI 96813

Re: *IN RE: SHALE OIL ANTITRUST LITIGATION*  
Case No. 1:24-md-03119-MLG-LF (D.N.M.)

Dear Attorney General Lopez:

Pursuant to Hawaii Revised Statute § 480-13.3(a), Plaintiffs in the above-captioned case notify you of the above-filed case. Attached please find a copy of the Complaint in which the specific allegations are presented in detail.

Please do not hesitate to contact us if you have any questions.

Sincerely,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

A handwritten signature in dark ink, appearing to read "Mollie Chadwick", written over a light blue horizontal line.

Mollie Chadwick

# **EXHIBIT E**



MOLLIE+CHADWICK

+ Via Certified U.S. Mail and E-Mail +

March 14, 2025

Office of the Attorney General of Nevada  
The Honorable Aaron D. Ford  
100 North Carson Street  
Carson City, NV 89701

Re: *IN RE: SHALE OIL ANTITRUST LITIGATION*  
Case No. 1:24-md-03119-MLG-LF (D.N.M.)

Dear Attorney General Ford:

Pursuant to Nevada Revised Statute § 598A.210(3), Plaintiffs in the above-captioned case notify you of the above-filed case. Attached please find a copy of the Complaint in which the specific allegations are presented in detail.

Please do not hesitate to contact us if you have any questions.

Sincerely,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

A handwritten signature in blue ink, appearing to read "Mollie Chadwick".

Mollie Chadwick

## **EXHIBIT F**



MOLLIE+CHADWICK

+ Via Certified U.S. Mail and E-Mail +

March 14, 2025

Office of the Attorney General of New York  
The Honorable Letitia James  
1 Empire State Plaza  
Albany NY 12223-1100

Re: *IN RE: SHALE OIL ANTITRUST LITIGATION*  
Case No. 1:24-md-03119-MLG-LF (D.N.M.)

Dear Attorney General James:

Pursuant to New York General Business Statute § 340(5), Plaintiffs in the above-captioned case notify you of the above-filed case. Attached please find a copy of the Complaint in which the specific allegations are presented in detail.

Please do not hesitate to contact us if you have any questions.

Sincerely,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

A handwritten signature in dark ink, appearing to read "mchadwick", written in a cursive style.

Mollie Chadwick

## **EXHIBIT G**





MOLLIE+CHADWICK

+ Via Certified U.S. Mail and E-Mail +

March 14, 2025

Office of the Attorney General of Rhode Island  
The Honorable Peter F. Neronha  
150 South Main Street  
Providence, RI 02903

Re: *IN RE: SHALE OIL ANTITRUST LITIGATION*  
Case No. 1:24-md-03119-MLG-LF (D.N.M.)

Dear Attorney General Neronha:

Pursuant to Title 6, Rhode Island General Law § 6-36-21, Plaintiffs in the above-captioned case notify you of the above-filed case. Attached please find a copy of the Complaint in which the specific allegations are presented in detail.

Please do not hesitate to contact us if you have any questions.

Sincerely,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

A handwritten signature in cursive script, appearing to read "Mollie Chadwick", written in dark ink.

Mollie Chadwick

## **EXHIBIT H**



MOLLIE+CHADWICK

+ Via Certified U.S. Mail and E-Mail +

March 14, 2025

Office of the Attorney General of Utah  
The Honorable Derek Brown  
Utah State Capitol Complex  
350 North State Street Suite 230  
Salt Lake City, UT 84114-2320

Re: *IN RE: SHALE OIL ANTITRUST LITIGATION*  
Case No. 1:24-md-03119-MLG-LF (D.N.M.)

Dear Attorney General Brown:

Pursuant to Utah Code § 76-10-3109(9), Plaintiffs in the above-captioned case notify you of the above-filed case. Attached please find a copy of the Complaint in which the specific allegations are presented in detail.

Please do not hesitate to contact us if you have any questions.

Sincerely,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

A handwritten signature in black ink, appearing to read "Mollie Chadwick".

Mollie Chadwick

# **EXHIBIT I**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

*In re: Shale Oil Antitrust Litigation*

This Document Relates to All Actions.

Case No. 1:24-md-03119-MLG-LF

Judge Matthew L. Garcia

**CERTIFICATE OF SERVICE**

Plaintiffs Abraham Drucker; Aegis Healthcare Solutions, Inc.; Andrew Caplen Installations LLC; Angela Mathes; Anne Lane; Barbara MacDowell and Phillip MacDowell; Best Expedite, Inc.; Brian Courtmanche; Catherine Foster; Cathie Gilstrap d/b/a Craig Gilstrap & Associates; Charles Romanek; City of San Diego, California; City of San Jose, California; County of San Mateo, California; Craig B. Greenfield Attorney at Law PC; Daniel Rosenbaum; David Sample; Deneige Kapor; Edward Allegretti d/b/a Alfred Auto Center; Eric Wilim; Ford County, Kansas; Garrett Mair; Garvin Promotion Group, LLC; Gustave Link; Hayday Farms LLP; Heather Patterson d/b/a Prestige Towing; Jeffrey Taub; John Smith; Josselyn's Getaway Cabins, LLC; Kathleen Byrnes; Kevin Allen d/b/a Kevin Allen Photography; Kim Franzen; Laurie Olsen Santillo; Marlin Svitak, Jr.; Matthew Foos; Mayor and City Council of Baltimore; Michael Clancy; Michael Scott; Reneldo Rodriguez; Richard Beaumont; Robert Jones; Russell Deman; Samantha Barsky d/b/a Noteify; Sue Jones; TBC Services, LLC; The Difference Landscapes; Thomas Caron; Thomas Cavaliere; Tracey M. Boston, LLC; Vera McKelley; Waypoint Residential, LLC; and Western Cab Company (collectively "Plaintiffs"), through their counsel, hereby certify that

Plaintiffs' Consolidated Class Action Complaint (Dkt. 86) was served via electronic mail and Certified U.S. Mail to the following State Attorneys General on this 14<sup>th</sup> day of March, 2025:

Office of the Attorney General of Arizona  
The Honorable Kris Mayes  
2005 N. Central Avenue  
Phoenix, AZ 85004

Office of the Attorney General of Nevada  
The Honorable Aaron D. Ford  
100 North Carson Street  
Carson City, NV 89701

Office of the Attorney General of Connecticut  
The Honorable William Tong  
165 Capitol Avenue  
Hartford, CT 06106

Office of the Attorney General of New York  
The Honorable Letitia James  
1 Empire State Plaza  
Albany NY 12223-1100

Office of the Attorney General of Hawaii  
The Honorable Anne E. Lopez  
425 Queen Street  
Honolulu, HI 96813

Office of the Attorney General of Rhode Island  
The Honorable Peter F. Neronha  
150 South Main Street  
Providence, RI 02903

Office of the Attorney General of Colorado  
The Honorable Phil Weiser  
Colorado Department of Law  
Ralph L. Carr Judicial Building  
1300 Broadway, 10th Floor  
Denver, CO 80203

Office of the Attorney General of Utah  
The Honorable Derek Brown  
Utah State Capitol Complex  
350 North State Street Suite 230  
Salt Lake City, UT 84114

Dated: March 14, 2025

/s/ Christopher A. Dodd  
Christopher A. Dodd  
DODD LAW OFFICE, LLC  
500 Marquette Avenue NW, Suite 1330  
Albuquerque, New Mexico 87102  
Tel: (505) 475-2932  
chris@doddnm.com

*Interim Liaison Counsel for Plaintiffs and  
Putative Class*

Patrick J. Coughlin (*pro hac vice*)  
Carmen Medici (*pro hac vice*)  
Daniel J. Brockwell (*pro hac vice*)  
Isabella De Lisi (*pro hac vice*)

Michael Dell'Angelo (*pro hac vice*)  
Candice Enders (*pro hac vice*)  
BERGER MONTAGUE PC  
1818 Market Street  
Suite 3600  
Philadelphia, PA 19103  
Tel: (215) 875-3080  
mdellangelo@bm.net  
cenders@bm.net

Richard D. Schwartz (*pro hac vice*)  
BERGER MONTAGUE PC  
1720 W. Division  
Chicago IL 20622  
Tel: (773) 257-0255

SCOTT+SCOTT ATTORNEYS AT LAW  
LLP

600 W. Broadway, Suite 3300  
San Diego, CA 92101  
Tel: (619) 233-4565  
pcoughlin@scott-scott.com  
cmedici@scott-scott.com  
dbrockwell@scott-scott.com  
idelisi@scott-scott.com

Patrick McGahan (*pro hac vice*)  
Michael Srodoski (*pro hac vice*)  
SCOTT+SCOTT ATTORNEYS AT LAW  
LLP

156 S Main Street  
P.O. Box 192  
Colchester, CT 06415  
Tel: (860) 537-5537  
pmcgahan@scott-scott.com  
msrodoski@scott-scott.com

Karin E. Garvey (*pro hac vice*)  
SCOTT+SCOTT ATTORNEYS AT LAW  
LLP

230 Park Ave., 24th Floor  
New York, NY 11069  
Tel: (212) 223-6444  
kgarvey@scott-scott.com

rschwartz@bm.net

Karin B. Swope (*pro hac vice*)  
Thomas E. Loeser (*pro hac vice*)  
Vara G. Lyons (*pro hac vice*)  
Ellen Wen (*pro hac vice*)  
COTCHETT, PITRE, & McCARTHY, LLP  
1809 7<sup>th</sup> Avenue, Suite 1610  
Seattle, WA 98103  
Tel: (206) 778-2123  
kswope@cpmlegal.com  
tloeser@cpmlegal.com  
vlyons@cpmlegal.com  
ewen@cpmlegal.com

Joseph W. Cotchett (*pro hac vice*)  
Adam Zapala (*pro hac vice*)  
Vasti S. Montiel (*pro hac vice*)  
COTCHETT, PITRE, & McCARTHY, LLP  
840 Malcolm Road  
Burlingame, CA 94010  
Tel: (650) 697-6000  
jcotchett@cpmlegal.com  
azapala@cpmlegal.com  
vmoniel@cpmlegal.com

*Interim Co-Lead Counsel for Plaintiffs and the  
Putative Class*